

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
CASE NO. 1:22-cv-24023-SCOLA/GOODMAN**

KENNETH C. GRIFFIN,

Plaintiff,

v.

INTERNAL REVENUE SERVICE and U.S.
DEPARTMENT OF THE TREASURY,

Defendants.

NOTICE OF 90 DAYS EXPIRING

Plaintiff Kenneth C. Griffin (“Mr. Griffin”) respectfully provides notice, pursuant to Local Rule 7.1(b)(4), that more than 90 days have elapsed since the parties completed briefing on the Government’s Motion to Dismiss the Second Amended Complaint. In accordance with Local Rule 7.1(b)(4), Mr. Griffin submits the following:

- The United States’ Motion to Dismiss Second Amended Complaint was filed and served on November 27, 2023 (ECF 58);
- Mr. Griffin’s Opposition to Motion to Dismiss Second Amended Complaint was filed and served on December 11, 2023 (ECF 74);
- The United States’ Reply in Support of Motion to Dismiss was filed and served on December 18, 2023 (ECF 78);
- This Court did not hold a hearing on the Motion to Dismiss.

Dated: April 1, 2024

Respectfully submitted,

By: /s/ Jason D. Sternberg

William A. Burck (*pro hac vice*)

Derek L. Shaffer (*pro hac vice*)

Alexander J. Merton (*pro hac vice*)

QUINN EMANUEL URQUHART & SULLIVAN LLP

1300 I Street, N.W., Suite 900

Washington, DC 20005

(202) 538-8334

williamburck@quinnemanuel.com

derekshaffer@quinnemanuel.com

ajmerton@quinnemanuel.com

John F. Bash (*pro hac vice*)

QUINN EMANUEL URQUHART & SULLIVAN LLP

300 West 6th St, Suite 2010

Austin, TX 78701

(737) 667-6100

johnbash@quinnemanuel.com

Jason D. Sternberg (Florida Bar No. 72887)

QUINN EMANUEL URQUHART & SULLIVAN LLP

2601 South Bayshore Dr, Suite 1550

Miami, FL 33133

(305) 402-4880

jasonsternberg@quinnemanuel.com

Christopher D. Kercher (*pro hac vice*)

Peter H. Fountain (*pro hac vice*)

QUINN EMANUEL URQUHART & SULLIVAN LLP

51 Madison Avenue, 22nd Floor,

New York, New York 10010

(212) 849-7000

christopherkercher@quinnemanuel.com

peterfountain@quinnemanuel.com

Counsel to Plaintiff Kenneth C. Griffin

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 1st day of April, 2024, I filed a copy of the foregoing document with the Clerk of Court using the CM/ECF electronic filing system, which will send notification to all counsel of record.

By: /s/ Jason D. Sternberg
Jason D. Sternberg
Fla. Bar. No. 72887
jasonsternberg@quinnemanuel.com